

Exhibit A

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Southern District of MississippiNorthern DivisionCHRISTIAN Norwood

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

... see attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

3:19-cv-829

(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR A CIVIL CASE**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Christian Deon Norwood

Street Address

2335 Castle Hill Dr

City and County

Jackson Hinds

State and Zip Code

Mississippi 39213

Telephone Number

601-416-4846

E-mail Address

christianNorwood09@gmail.com**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Myron Smith
Police Officer

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Bernard Burton
Police Officer

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

City of Jackson Police Department

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

City of Jackson Internal Affairs

List of Defendants

- 1) Myron Smith
- 2) Bernard Burton
- 3) City of Jackson Police Department
- 4) City of Jackson Internal Affairs

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

- 1) Amendment 4 - Searches and Seizures
- 2) Amendment 5 - Life, Liberty and Property
- 3) Amendment 14 - Equal Protection of the Law

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

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b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
the laws of the State of (name) _____, and has its
principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attached

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See Attached

MYRON SMITH

Defendant #1

4th — Defendant violated my 4th Amendment (Searches and Seizures), which in return makes him liable for damages and other reliefs sought. On November 17, 2018, the defendant searched my belongings without consent, seized my vehicle and belongings unlawfully, ~~and arrested me without probable cause~~. This incident occurred at the intersection of Northside Dr & Country Club Dr.

Defendant violated my 5th Amendment (Deprived me of Life, Liberty & Property), which in return makes him responsible for damages and other reliefs sought. On November 17, 2018, the defendant arrested me and neglected the injuries he had just inflicted to me from the collision of his police cruiser into my ATV. ~~This~~ incident occurred at the intersection of Northside Dr and Country Club Dr in Jackson, MS.

Defendant violated my 14th Amendment (Deny to any person within its jurisdiction the Equal Protection of the Laws), which in return makes him ~~res~~ liable for damages and other reliefs sought. On November 17, 2018, the defendant denied me of medical care / attention, knowing I was hurt badly; he and his partner laughed at me while I was begging for help with my injuries. Defendant did not treat me as a citizen, rather a manic criminal without probable cause. This all happened at the intersection of Northside Dr & Country Club Dr.

Bernard BURTON

Defendant #2

Defendant violated my 4th Amendment (Search and Seizures), which in return makes him liable for damages and reliefs sought. On November 17, 2018, the defendant searched me and my belongings without consent. He seized my vehicle and belongings ~~an~~ unlawfully. This incident occurred at the intersection of Northside Dr & Country Club Dr.

Defendant violated my 5th Amendment (Deprived me of my life, Liberty and Property), which in return makes him liable for damages and reliefs sought. On November 17, 2018, the defendant arrested me and used unnecessary and excessive force slamming me on the patrol car and pavement (along with his partner). This incident occurred at the intersection of Northside Dr & Country Club Dr.

Defendant violated my 14th Amendment (Confiscating my property without due process & Denied me Equal Protection under the law) which in return makes him liable for damages and reliefs sought. On November 17, 2018, the defendant denied me of medical attention after partner had hit me off my ATV using his patrol car; knowing I was badly hurt, he failed to treat me as a citizen, rather a criminal without probable cause. This happened at the intersection of Northside Dr and Country Club Dr.

City of Jackson Police Dept

Defendant #3

Defendant violated my 4th Amendment (Searches and Seizures), which in return makes ~~them~~ liable for damages and other reliefs sought. On November 17, 2018, the defendant failed to properly train officers on coming in contact with a citizen that hasn't committed a crime, only a traffic violation. This incident occurred at the intersection of Northside Dr & Country Club Dr.

Defendant violated my 5th Amendment (Life, Liberty and Property), which in return makes them liable for any and all damages and reliefs sought. On ~~November~~ November 17, 2018, the defendant failed to train its officers on what to do in a situation where a person that's arrested for no criminal charges. Also their policy fails to explain to the officers how to go about how to disarm a non-violent fleeing suspect. This incident occurred at the intersection of Northside Dr and Country Club Dr.

Defendant violated my 14th Amendment (Confiscating Property without Due Process and Denied me Equal Protection under the Law), which in return makes them liable for all and any damages and reliefs sought. On November 17, 2018, at the intersection of Northside Dr and Country Club Dr, the defendant failed to ~~help~~ train officers on how to handle an injured ~~person~~ ^{person} ~~from a traffic collision~~ (non-violent/no crime committed). Also never communicated where my ATV and belongings were taken to.

Defendant #4

Defendant violated my 14th Amendment (denied of Equal Protection under the Law / Civil Rights), which in return makes them liable for damages and other reliefs sought. On December 6, 2018, the defendant took a verbal & written statement about the accident I was involved in on my ATV and told me they would do an investigation on the complaint at hand. ~~I was questioned~~ I was questioned for several hours under a polygraph testing machine, and after I finished the testing I was told I would be contacted via phone/email about the conclusion. I was never contacted by Internal Affairs. It took several months of me waiting and after no contact I went back to the Internal Affairs headquarters to find out what was going on. Once I was greeted by the officer at the door and explained why I was there, I was told the test results came back "Inconclusive" and that no body camera/dash camera footage was recorded by the officers of the incident. They did not do a ~~thorough~~ thorough investigation and attempted to hide evidence/help the officers avoid the ~~neg~~ consequences of their actions.

RELIEF

This is the list of damages that I am asking the court to order/award. They are as follows:

- 1) Hospital Bills = \$18,547.79
- 2) Jobs Not Rendered = \$3,000
- 3) Lost Jobs because of Inactive Marketing/Loss of Customers =
 $\$5,000 \times \text{per month (6 months)} = \underline{\$30,000}$
- 4) ATV = \$2,700
- 5) GoPro 4K Action Video Camera = \$850
- 6) Any/All Legal Fees acquired from Civil Complaint
 (Court Costs + Fees) = \$500
- 7) Future Hospital Bills & Physical & Mental Therapy,
 Medications & all other ongoing medical attention and
 Visits) = \$10,000
- 8) Unlawful Detainment = $(\$1 \text{ per second} \times 6 \text{ hours})$
\$3,600
- 9) Unlawful Arrest = $(\$1 \text{ per second} \times 6 \text{ hours})$
\$3,600
- 10) Defamation of Character = \$500,000
- 11) Emotional Distress = \$100,000 (Multiplier Method)
- 12) Excessive Force = \$1,000,000

- 13) Alienation of Affection = \$ 1,500,000
- 14) Malicious Prosecution = \$ 150,000
- 15) Harassment = \$ 50,000
- 16) Negligence = \$ 250,000
- 17) Illegal Search & Seizure = \$ 100,000
- 18) Pain & Suffering = \$ 250,000
- 19) Mental Anguish = \$ 500,000
- 20) Police Misconduct = \$ 250,000

TOTALS

~~\$4,722,297.79~~

\$4,722,297.79

See Attached

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7/9/20

Signature of Plaintiff

Printed Name of Plaintiff

Christian Norwood

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address